

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

JOHN J. VAUGHN, GERALD A.
KALBFLEISCH, MICHAEL HATHAWAY, and
MYRTLE HATHAWAY,

Plaintiffs,

v.

PUTNAM INVESTMENT MANAGEMENT,
LLC and PUTNAM RETAIL MANAGEMENT,
LIMITED PARTNERSHIP,

Defendants.

Civil Action No. 04-10988-GAO

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE A REPLY
MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION TO EXPAND THE
TWENTY DEPOSITION LIMIT**

Plaintiffs respectfully move the Court, pursuant to Local Rule 7.1(B)(3), for leave to file a reply memorandum in further support of their motion to expand the twenty deposition limit set by this Court. As grounds for this Motion, Plaintiffs further state as follows:

1. On January 12, 2007, Plaintiffs filed their Motion to Expand the Twenty Deposition Limit with this Court.
2. On January 26, 2007, Defendants filed their Opposition to Plaintiffs' Motion.
3. Plaintiffs' proposed Reply Memorandum is needed to thoroughly, and concisely address the allegations, arguments and authorities Defendants raise in their Opposition.
4. Additionally, plaintiffs have met and conferred with Defendants regarding the filing of this Motion, and Defendants do not oppose the filing of this Motion.

CERTIFICATION UNDER LOCAL RULE 7.1(a)(2)

The undersigned hereby certifies that Plaintiffs' counsel has conferred with counsel for Defendants, who do not oppose the relief sought by this motion.

Dated: January 31, 2007

Respectfully submitted,

/s/ David E. Marder

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CERTIFICATE OF SERVICE

I, David E. Marder, hereby certify that this document filed through the ECF system on January 31, 2007, will be served electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those non-registered participants.

/s/ David E. Marder

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